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14 Attorneys for Defendants
15 APEX MATERIALS, LLC, ELKHORN
16 ENVIRONMENTAL, LLC, WERDCO BC,
17 INC., WERDCO LLC, BRENT CONRAD,
18 BRANDON CONRAD, PATRICIA CONRAD, and
19 HARBER COMPANY, INC.

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

15 LANCE D. STUCKEY, JR., Individually and
16 on behalf of all others similarly situated,

17 Plaintiffs,

18 v.

19 APEX MATERIALS, LLC, ELKHORN
20 ENVIRONMENTAL, LLC, WERDCO BC,
21 INC., WERDCO LLC, BRENT CONRAD,
22 BRANDON CONRAD, PATRICIA CONRAD,
23 LAS VEGAS PAVING CORPORATION,
24 TAB CONTRACTORS, INC., WILLIAM
CHARLES CONSTRUCTION COMPANY,
HARBER COMPANY, INC., John Does I to
XX, name fictitious true name and number of
persons being unknown, and XYZ Corporations
I to XX, name fictitious true name of number
of entities being unknown,

25 Defendants.

Case No. 2:22-cv-01964-APG-VCF

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**STIPULATION AND [PROPOSED]
ORDER TO STAY MATTER IN ITS
ENTIRETY PENDING GLOBAL
SETTLEMENT**

[FIRST REQUEST]

Plaintiff, LANCE D. STUCKEY, JR. ("Plaintiff"), and Defendants, APEX MATERIALS,
LLC, ELKHORN ENVIRONMENTAL, LLC, WERDCO BC, INC., WERDCO LLC, BRENT

1 Dated: April 13, 2023

2 Respectfully submitted,

3 /s/ Lynne K. McChrystal

4 PAUL T. TRIMMER, ESQ.
5 LYNNE K. MCCHRYSTAL, ESQ.
6 JACKSON LEWIS P.C.

7 Attorneys for Defendant
8 WILLIAM CHARLES CONSTRUCTION COMPANY

Dated: April 13, 2023

Respectfully submitted,

/s/ Nicole E. Lovelock

NICOLE E. LOVELOCK, ESQ.
DONNA DIMAGGIO, ESQ.
JONES LOVELOCK

Attorneys for Defendant
TAB CONTRACTORS, INC.

9
10 Dated: April 13, 2023

11 Respectfully submitted,

12 /s/ Tye S. Hanseen

13 TYE S. HANSEEN, ESQ.
MARQUIS AURBACH COFFING

14 Attorneys for Defendant
15 LAS VEGAS PAVING CORPORATION

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19 IT IS SO ORDERED.

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21 
22 Cam Ferenbach

23 United States Magistrate Judge

24 DATED 4-18-2023